

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

MARTHA FEDORIW,

Plaintiff,

v.

CIV. A. NO. 1:07-CV-7446 (HB)

CARL ZEISS VISION, INC., REED  
EXHIBITION COMPANIES, MAUK  
DESIGN, INC., PINNACLE EXHIBITS, INC.  
and NEW YORK CONVENTION CENTER  
OPERATING CORPORATION,

Defendants.

**DEFENDANT REED ELSEVIER, INC.'S ANSWER TO CROSS-CLAIMS**

Defendant Reed Elsevier, Inc. (improperly pled as Reed Exhibition Companies) (hereinafter "Reed"), as and for its answer to the cross-claims of Carl Zeiss Vision, Inc., Mauk Design, Inc., and Pinnacle Exhibits, Inc., alleges as follows:

Reed denies the cross-claims directed to Reed in Carl Zeiss Vision, Inc., Mauk Design, Inc., and Pinnacle Exhibits, Inc.'s respective cross-claims.

**AS AND FOR A FIRST DEFENSE**

1. Reed incorporates by reference all affirmative defenses it has already asserted in its Answer to the Amended Complaint.

**WHEREFORE**, Defendant Reed Elsevier, Inc. demands judgment dismissing Carl Zeiss Vision, Inc., Mauk Design, Inc. and Pinnacle Exhibits, Inc.'s cross-claims directed to Reed Elsevier, Inc., together with any other relief as this Court may deem just and proper.

/s/Angelo A. Stio III  
Angelo A. Stio III (AS 7880)  
PEPPER HAMILTON LLP  
A Pennsylvania LLP  
301 Carnegie Center  
Suite 400  
Princeton, NJ 08543-5276  
(609) 951-4125 (telephone)  
(609) 452-1147 (fax)

Attorneys for defendant Reed Elsevier, Inc.

Dated: July 17, 2008

TO: Peter A. Greiner, Esq.  
MEYERSON & O'NEILL  
*Admitted Pro Hac Vice*  
Attorneys for Plaintiff  
Office & P.O. Address  
1700 Market Street  
Suite 3025  
Philadelphia, PA 19103  
(215) 972-1376

Stavros E. Sitinas, Esq.  
WINGATE, RUSSOTTI & SHAPIRO, LLP  
Attorneys for Plaintiff  
Office & P.O. Address  
420 Lexington Avenue  
Suite 2750  
New York, New York 10170  
(212) 986-7353

Peter H. Cooper, Esq.  
BIEDERMANN, HOENIG, MASSAMILLO & RUFF, P.C.  
Attorneys for Defendant  
CARL ZEISS VISION, INC.  
570 Lexington Avenue, 16<sup>th</sup> Floor  
New York, New York 10016  
(212) 697-6555

Gregory T. Walthall, Esquire  
HOEY, KING, TOKER & EPSTEIN  
Attorneys for Defendant  
PINNACLE EXHIBITS, INC.  
55 Water Street, 29th Floor  
New York, NY 10041

Heidi M. Weiss, Esquire  
LAW OFFICES OF EDWARD GARFINKEL  
Attorneys for Defendant  
NEW YORK CONVENTION CENTER OPERATING CORP.  
110 William Street  
17<sup>th</sup> Floor  
New York, New York 10038  
(212) 809-8000

Eric Betron, Esq.  
KELLY, RODE & KELLY, LLP  
Attorneys for Defendant  
MAUK DESIGN, INC.  
330 Old Country Road  
Suite 305  
Mineola, NY 11501

**CERTIFICATE OF SERVICE**

I hereby certify that on July 17, 2008, the foregoing Defendant Reed Elsevier, Inc.'s Answer to Cross-Claims was filed via CM / ECF and first class mail, which will provide notification of filing to the following counsel:

Peter A. Greiner, Esquire  
MEYERSON & O'NEILL  
1700 Market Street  
Suite 3025  
Philadelphia, PA 19103

Stavros E. Sitinas, Esquire  
WINGATE, RUSSOTTI & SHAPIRO, LLP  
420 Lexington Avenue  
Suite 2750  
New York, New York 10170

Peter H. Cooper, Esquire  
BIEDERMANN, HOENIG, MASSAMILLO & RUFF, P.C.  
570 Lexington Avenue, 16<sup>th</sup> Floor  
New York, New York 10016

Gregory T. Walthall, Esquire  
HOEY, KING, TOKER & EPSTEIN  
55 Water Street, 29th Floor  
New York, NY 10041

Heidi M. Weiss, Esquire  
LAW OFFICES OF EDWARD GARFINKEL  
110 William Street, 17<sup>th</sup> Floor  
New York, New York 10038

Eric B. Betron, Esquire  
KELLY, RODE & KELLY, LLP  
330 Old Country Road, Suite 305  
Mineola, NY 11501

/s/Angelo A. Stio III  
Angelo A. Stio III (AS 7880)